

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN**

ADAM PLETCHER,
SAMANTHA PLETCHER,

Plaintiffs,

Case No: 20-cv-00811

v.

SPARKPLUG CAPITAL LLC,

Defendant.

SPARKPLUG CAPITAL LLC's RULE 26(a)(1) INITIAL DISCLOSURES

Pursuant to Fed. R. Civ. P. Rule 26(a)(1), Defendant Sparkplug Capital LLC (“Defendant”), by its attorneys, Wilson Elser Moskowitz Edelman & Dicker, LLP, makes the following Initial Disclosures:

I. Identification of Individuals Likely to Have Discoverable Information.

1. Adam Pletcher, Plaintiff.
2. Samantha Pletcher, Plaintiff.
3. Bob Vanderploeg. Mr. Vanderploeg is Red Dot Storage’s Director of Field Operations and may provide information regarding operations and maintenance of the storage facility at issue. Mr. Vanderploeg may be contacted through defense counsel.
4. Kurt Bottlemy. Mr. Bottlemy was a Field Supervisor on or about the time of the incident alleged in Plaintiffs’ Complaint and may provide information regarding operations and maintenance of the storage facility at issue. Mr. Bottlemy’s last known address is 517 S. Memorial Ave, Rockford, Illinois 61102.
5. Representative of Defendant. A representative of Defendant may provide information regarding the operations and ownership of the storage facility at issue. A representative may be contacted through defense counsel.

6. Representative of 1900 A.D., Limited Partnership, Registered Agent Michael E. Coyle, 5886 Tree Line Drive, Madison, Wisconsin 53711. A representative of 1900 A.D., Limited Partnership may provide information regarding operations and maintenance, lease agreements, and tenants of the storage facility at issue prior to Red Dot Storage 10, LLC's ownership of said facility.
7. Representative of Safeway Self Storage, LLC, (administratively dissolved on September 16, 2017), Registered Agent John L. Maier, Jr., 114 North Church Street, Elkhorn, Wisconsin 53121. A representative of Safeway Self Storage, LLC may provide information regarding operations and maintenance, lease agreements, and tenants of the storage facility at issue prior to Red Dot Storage 10, LLC's ownership of said facility.
8. Representative of third-party vendor(s). A representative of a third-party vendor may provide information regarding maintenance and/or repair work performed at the subject storage facility.
9. Any and all medical care providers who provided any and all treatment to the Plaintiff Samantha Pletcher.
10. Any lay and/or expert witness(s) identified by Plaintiffs.
11. Defendant reserves the right to amend or modify this list as additional or other witnesses become known.

II. Categories of Documents that May be Used in Defense.

1. Maintenance and/or repair records of the subject storage facility location. These documents are in the possession of Defendant and/or an agent of Defendant.
2. Red Dot Storage's Field Operations Manual. This document is currently in possession of Defendant's counsel.
3. Rental Agreement for leasing a self-storage unit at the subject storage facility. This document is currently in possession of Defendant's counsel.
4. Agreement of Assignment and Assumption of Leases. This document is currently in possession of Defendant's counsel.
5. Any and all state, federal, or international regulations governing Defendant's duties and obligations at any time relevant to the subject conduct that forms the basis of Plaintiffs' complaint.
6. Any deposition exhibits should automatically be considered potential documents that may be used in support of any defenses.

7. Any and all documents identified by Plaintiffs as part of their initial disclosures and/or in response to any discovery requests. These documents would currently be within the possession of Plaintiffs.
8. Defendant reserves the right to amend or modify this list as additional or other evidence becomes known.

III. Computation of Damages.

Defendant is not seeking compensation or damages, but reserves the right to pursue attorney's fees and/or costs from Plaintiffs.

IV. Insurance Policies Relevant to this Action.

Nationwide Insurance Policy No. ACP3007315098 with a policy period of October 1, 2016 through October 1, 2017 under policy number. A copy of said policy will be made available for inspection and/or copy upon request.

Dated this 27th day of October, 2020.

/s/ Kevin A. Christensen

Kevin A. Christensen (SBN: 1011760)

Andrea G. Jahimiak (SBN: 1115348)

Wilson Elser Moskowitz Edelman & Dicker, LLP

Attorneys for Defendant, Sparkplug Capital LLC

740 N. Plankinton Avenue, Suite 600

Milwaukee, WI 53203

Phone: 414-276-8816

Kevin.Christensen@wilsonelser.com

Andrea.Jahimiak@wilsonelser.com